REMARKS

Claims 1-15, 17-19, 21 and 23-24 are all the claims pending in the application.

Claim rejections

Claims 1-4, 7 and 23-24 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Robarts et al. (U.S. Publication No. 2005/0278741; hereinafter "Robarts") in view of Lee et al. (U.S. Patent No. 6,463,428; hereinafter "Lee") and further in view of Dagtas et al. (U.S. Publication No. 2003/0093260; hereinafter "Dagtas").

Claims 8-15, 17-19 and 21 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Robarts in view of Lee and Dagtas, and further in view of Kikinis (U.S. Patent No. 7,213,256; hereinafter "Kikinis").

Claims 5 and 6 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Robarts in view of Lee and Dagtas, and further in view of Hori et al. (U.S. Patent No. 7,209,942; hereinafter "Hori").

Applicants traverse the rejection as follows.

Claim 1

Claim 1 recites, *inter alia*, "the search frequency corresponds to a frequency at which the search terms are input from the external input device." In response, the Examiner concedes that Robarts and Lee do not teach or suggest these features of claim 1, but asserts that Dagtas (newly cited reference) discloses these features missing in Robarts and Lee. The Examiner asserts that paragraphs [0045] and [0048] of Dagtas discloses the features discussed above. Applicants respectfully disagree for at least the following reasons.

Dagtas is directed to an apparatus and method for conducting exclusive and inclusive metadata searches to identify and second multimedia programs (paragraph [0001]). The apparatus of Dagtas includes a metadata search controller that is capable of receiving metadata from video signals, audio signals and text signals of multimedia programs. The metadata search controller compares user specified search words with metadata words to find programs that meet the user specified search criteria. The metadata search controller can execute an exclusive metadata search to search for exact matches between a user specified search word and metadata word. Further, the metadata search controller can also search for matches between a user specified search word and a metadata word that is related to the user specified search word in a word pair contained within a word pair database (paragraph [0015]). However, Dagtas does not teach or suggest the claimed feature of "the search frequency corresponds to a frequency at which the search terms are input from the external input device."

In the cited portions of the references, Dagtas merely discloses that the controller 250 comprises a metadata search module that compares search words specified by the user with words contained within the metadata (paragraph [0045]). Moreover, Dagtas discloses a computer software 350 that includes weight factor assignment application 420, exclusive metadata search application 430, inclusive metadata search application 440, word pair database 450, rank value calculation application 460, priority assignment application 470 and recording priority update application 480 (paragraph [0048]). However, these cited applications in paragraph [0049] of Dagtas, do not teach or remotely suggest **a frequency** at which the search terms are input from the external input device."

In particular, the rank value calculation application 460 calculates rank values, which represents a measure of the overall relevance of a program with respect to the metadata search criteria, using the search field weight factor for each search field and the number of matches of words found during the exclusive or inclusive metadata search (paragraph [0068]). Then, the priority assignment application 470 lists programs in accordance with the respective rank values calculated by the rank value calculation application 460 (paragraph [0072]). Furthermore, the search field weight factor is either selected by the user or generated through the viewing habits of the users. However, there is no teaching or suggestion of a search frequency corresponding to a **frequency** at which the search terms are input from the external input device

In view of the above, it is clear that the combination of Robarts, Lee and Dagtas is completely silent about **a frequency** at which the search terms are input from the external input device. For at least these reasons discussed above, Applicants submit that claim 1 is patentable over the cited references.

Claims 8, 11, 15 and 19

Applicants submits that since claims 8, 11, 15 and 19 recite subject matter analogous to claim 1 and since Kikinis does not teach or suggest the features of claim 1 missing in Robarts, Lee and Dagtas, claims 8, 11, 15 and 19 are patentable for at least the analogous reasons claim 1 is allowable.

Claims 2-4, 7, 9, 12-14, 17, 18, 21 and 23-24

Applicants submit that claims 2-4, 7, 9, 12-14, 17, 18, 21 and 23-24 depend from one of the independent claims, and therefore these claims are patentable at least by virtue of their dependency.

Claims 5 and 6

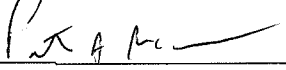
Applicants submit that since claims 5 and 6 depend from claim 1 and since Hori does not cure the deficiency noted above with regard to claim 1, Applicants respectfully submit that claim 1 is allowable over the cited references.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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23373
CUSTOMER NUMBER

Date: December 28, 2009